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Attorneys for Plaintiff

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 DONNA CARLSON, an individual;
12
13 Plaintiff,

14 vs.

15 SAM'S WEST, INC., a Foreign Corporation
doing business as SAM'S CLUB, and also doing
16 business as SAM'S CLUB #6382; SAM'S REAL
17 ESTATE BUSINESS TRUST; DOES I through
18 X; and ROE CORPORATIONS I through X,
inclusive,
19 Defendants.

Case No.: 2:17-cv-02882-MMD-GWF

STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO OPPOSE
DEFENDANT'S MOTION FOR
PROTECTIVE ORDER PRECLUDING
INAPPROPRIATE AREAS OF
FED.R.CIV.P. 30(B)(6) EXAMINATION

FIRST REQUEST

21 Plaintiff DONNA CARLSON ("Plaintiff") and Defendants SAM'S WEST, INC. and
22 SAM'S REAL ESTATE BUSINESS TRUST ("Defendants") by and through their respective
23 counsel of record, do hereby stipulate to extend the time for Plaintiff to oppose Defendants'
24 Motion for Protective Order Precluding Inappropriate Areas of FRCP 30(b)(6) Examination, by
25 fourteen (14) days.
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1 Pursuant to Local Rule 2.25, the parties hereby aver that this is the first request for such
2 extension of time regarding Plaintiff's opposition to this motion.

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4 The parties aver, pursuant to Local Rule 2.25, that good cause exists for the requested
5 extension. It is Plaintiff's position that testimony from Defendant's 30(b)(6) representative is
6 necessary to include in her opposition. That deposition occurred on May 22, 2018, the transcript
7 from that deposition will most likely not be available until at least June 8, 2018.

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9 **PROPOSED NEW DEADLINE FOR PLAINTIFF'S OPPOSITION**

10 Plaintiff's Opposition to Defendant's Motion for Protective Order

11 Currently: June 1, 2018

12 Proposed: June 15, 2018

13 Hearing on Defendant's Motion for Protective Order

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15 Currently: June 14, 2018 – 10:30 a.m.

16 Proposed: June 27, 2018

17 If this extension is granted, the hearing currently scheduled for June 14, 2018, at 10:30
18 a.m. regarding the oral arguments on this motion should be rescheduled to allow Defendants time
19 to reply to Plaintiff's opposition.

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1 The parties aver that this request for extension of time for Plaintiff's opposition to
2 Defendants' Motion for Protective Order is made in good faith and not for the purpose of delay.

3 Dated this 29th day of May, 2018.

Dated this 29th day of May, 2018.

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6 /s/ Christopher S. Mishler

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/s/ Ryan Kerbow

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IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE

DATED: 5-31-2018